

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

SDDDC LLC, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

GOODRX, INC.; GOODRX HOLDINGS,
INC.; CVS CAREMARK CORPORATION;
EXPRESS SCRIPTS HOLDING COMPANY;
MEDIMPACT HEALTHCARE SYSTEMS,
INC.; and NAVITUS HEALTH SOLUTIONS,
LLC,

Defendants.

Case No. 1:24-cv-00550-MSM-LDA

CLASS ACTION

**JOINT STIPULATION TO
STAY PROPOSED
PLAINTIFF-INTERVENORS'
MOTION TO INTERVENE
AND TRANSFER ACTION TO
THE CENTRAL DISTRICT OF
CALIFORNIA**

Pursuant to Federal Rule of Civil Procedure 6(b), Keaveny Drug, Inc.; Community Care Pharmacy, LLC; Minnesota Independent Pharmacists; the Philadelphia Association of Retail Druggists; Old Baltimore Pike Apothecary, Inc.; and Smith's Pharmacy II, Inc. (together, the "Proposed Intervenor"), Plaintiffs Bueno Pharmacy LLC ("Plaintiff"), and Defendants GoodRx, Inc.; GoodRx Holdings, Inc.; CVS Caremark Corp.; Express Script Holding Co.; MedImpact Healthcare Systems, Inc.; and Navitus Health Solutions, LLC (together, "Defendants"), by and through their undersigned counsel of record, request an Order of the Court and hereby stipulate as follows:

WHEREAS, on December 26, 2024, Plaintiff filed the instant action, a proposed class action alleging a conspiracy among Defendants to fix the rates of reimbursement paid by certain pharmacy benefits managers to certain pharmacies for generic drugs (ECF No. 1) (the "Action");

WHEREAS, this Action is one of fourteen similar cases filed in four federal jurisdictions;

WHEREAS, on January 2, 2025, the Proposed Intervenor filed a joint motion to intervene and transfer this Action to the Central District of California pursuant to 28 U.S.C. § 1404 (ECF No. 4);

WHEREAS, on January 13, 2025, a petition to transfer and centralize these actions in the District of Rhode Island was filed pursuant to 28 U.S.C. § 1407 with the Judicial Panel on Multidistrict Litigation ("JPML" or "Panel"), Am. Mot. to Transfer and Centralize Related Proceedings, *In re: GoodRx and Pharmacy Benefit Manager Antitrust Litig. (No. II)*, MDL No. 3148, ECF No. 1-1 (attached as Exhibit A);

WHEREAS, on January 16, 2025, Plaintiff filed an opposition to the Proposed Intervenor's Section 1404 motion in the instant action (ECF No. 9);

WHEREAS, Plaintiff in the Instant Action and the Proposed Intervenor intend to support centralization of these cases via a §1407 MDL process, but differ as to whether the Central District of California or the District of Rhode Island is the appropriate transferee district;

WHEREAS, the JPML will hear argument on the § 1407 petition (and the responses filed thereto) on a future date, likely March 27, 2025;¹

WHEREAS, the current deadline for the Proposed Intervenor's to reply to Plaintiff's Opposition to Proposed Plaintiff-Intervenor's Joint Motion to Intervene and Transfer Action to the Central District of California is January 23, 2025 (ECF No. 9);

WHEREAS, counsel for Plaintiff, counsel for the Proposed Intervenor's, and counsel for Defendants agree that, in light of the pending JPML proceeding, judicial efficiency is best served by staying the Proposed Intervenor's Joint Motion to Intervene and Transfer, such that any further briefing or hearing can take into account relevant developments regarding the JPML proceeding;

NOW THEREFORE, Proposed Intervenor's, Plaintiff, and Defendants, through their undersigned counsel, hereby stipulate and agree to stay the briefing schedule and hearing for Proposed Intervenor's Joint Motion to Intervene and Transfer until the JPML issues a ruling on the January 13, 2025 petition to transfer in *In re: GoodRx and Pharmacy Benefit Manager Antitrust Litig. (No. II)*, MDL No. 3148.

IT IS SO STIPULATED.

Dated: January 23, 2025
Providence, Rhode Island

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¹ See United States Judicial Panel on Multidistrict Litigation, *Hearing Information*, <https://www.jpml.uscourts.gov/hearing-information> (last accessed on Jan. 21, 2025).

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically with the United States District Court for the District of Rhode Island on the [DATE] and is available for viewing and downloading from the Electronic Case Filing system. A copy of the foregoing will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by mail to those indicated as nonregistered participants.

/s/_____